

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

)
)
MICHAEL DONALDSON,)
)
Plaintiff,)
)
v.) **Case No.: 3:18CV00097**
)
TRAE FUELS, LLC., et al.)
)
Defendants.)
)
)

CONSENT MOTION FOR LEAVE FOR WITNESS TO APPEAR TELEPHONICALLY

COMES NOW Plaintiff Michael Donaldson, with the consent of Defendants Trae Fuels, LLC and EnviroTech Services, Inc., and moves for leave for Plaintiff's witness Dr. Chetan Pai to appear at trial telephonically.

There is good cause for this motion. Plaintiff subpoenaed Dr. Pai to appear in person to testify, however, on January 13, 2020, Dr. Pai's office manager informed Plaintiff's counsel that Dr. Pai would be out of town attending a conference the week of January 22-24. Dr. Pai was one of Plaintiff's treating physicians. Plaintiff only expects to call Dr. Pai to confirm Plaintiff's diagnosis of pancreatic cancer and to explain how pancreatic cancer limits the bodily functions of those it afflicts. Plaintiff does not expect Dr. Pai's credibility to be at issue.

Defendants consent to this motion.

Respectfully submitted,

MICHAEL DONALDSON

ALAN LESCHT AND ASSOCIATES, PC

By: /s/Jack Jarrett
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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2020, I filed the foregoing with the Court's CM/ECF system which will automatically serve a copy on counsel of record for Defendants.

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Respectfully Submitted,

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